

**WARNER & SCHEUERMAN
Attorneys at Law
6 West 18th Street, 10th Floor
New York, New York 10011
Tel: (212) 924-7111
Fax: (212) 924-6111**

Jonathon D. Warner, Esq.
jdwarner@wslaw.nyc

Karl E. Scheuerman, Esq.
kescheuerman@wslaw.nyc

April 16, 2025

VIA ECF

Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC and respectfully write to repeat our request for a two-week extension to respond to this Court's April 2, 2025 Minute Order and this Court's Third Amended Preliminary Injunction dated March 31, 2025.

We are advised that our clients are still gathering the responsive documents, and our office is thus not yet prepared to make a responsive submission to the Court.

Respectfully,

/s/ Jonathon D. Warner

JDW/ks

cc: All counsel (via ECF)